

November 30, 2006

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, DC 20554

**Re: Request for Brief Extension of Time to File Reply Comments, WC Docket No. 02-60**

Dear Ms. Dortch:

I am writing to request a brief extension of time under section 1.46(b) of the Commission's rules to file the attached reply comments. I was unable to file the reply comments by the Commission's November 28, 2006 deadline due to personal illness and the Thanksgiving holiday. No parties will be prejudiced by a brief extension of time to accept these reply comments, and the Commission will benefit from having a fuller record in response to its request for public comment.

Please feel free to contact me if you have any questions regarding this matter.

Respectfully submitted,



Carla Smith, FHIMSS, CNM  
Executive Vice President  
HIMSS  
3800 Packard Road Suite 150  
Ann Arbor, MI 48108  
(734) 477-0860

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of )

Rural Health Care Support Mechanism )  
\_\_\_\_\_ )

WC Docket No. 02-60

**REPLY COMMENTS OF THE HEALTHCARE INFORMATION AND MANAGEMENT  
SYSTEMS SOCIETY (HIMSS)**

The Healthcare Information and Management Systems Society (“HIMSS”) submits these reply comments in response to Internet2’s comments, which were filed in response to the Commission’s Public Notice seeking public input on the Petition for Reconsideration or, in the Alternative, Clarification of the Commission’s September 29, 2006 Order filed by National LambdaRail, Inc. (“NLR”) on October 30, 2006 in WC Docket No. 02-60.

HIMSS is the nation’s leading healthcare industry organization dedicated to improving the quality, safety, and cost-effectiveness of healthcare through the appropriate use of information technology and management systems. HIMSS represents more than 20,000 members, including more than 300 corporate members that represent organizations employing millions of individuals. A vision of a connected and interoperable healthcare infrastructure is one of the most significant healthcare industry efforts of the 21st century, and HIMSS has taken a leadership role in making this vision a reality. To this end, HIMSS has partnered with Internet2 to explore the development of a secure, reliable, and advanced networking solution for the transmission of medical information, messages, and images throughout the healthcare

industry. HIMSS decided to partner with Internet2 due to the belief that as healthcare accelerates its adoption of information technology solutions to improve the quality and cost-effectiveness of patient care, an advanced, secure national backbone could support the deployment of telehealth, telemedicine, and other important healthcare applications. Given these qualifications, the Commission made the appropriate decision in making Internet2's network the cornerstone of its healthcare broadband network pilot program.

At the same time, the Commission's pilot program will work only if the funded state and regional networks all connect to the same backbone network. Testing the interoperability of these local healthcare networks is key. Promoting such interoperability is one of HIMSS's core intentions. But NLR's backbone does not interconnect with Internet2's. Modifying the pilot program to embrace multiple non-interconnected networks would diminish its value as a test for developing a single national network.

#### **I. HIMSS Has a Strong Interest in the Success of the Commission's Pilot Program.**

HIMSS is committed to improving healthcare through the appropriate use of information technology and management systems, and therefore it is interested in and supportive of the success of the Commission's pilot program.<sup>1/</sup> HIMSS is the healthcare industry's membership organization exclusively focused on providing leadership for the optimal use of healthcare information technology and management systems for the betterment of healthcare. Founded in 1961, its membership includes more than 20,000 individual healthcare professionals, 45 chapters, and more than 300 corporations. HIMSS frames and leads healthcare public policy and industry practices through advocacy, educational, and professional development initiatives

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<sup>1/</sup> For more information on HIMSS, please see <http://www.himss.org>.

designed to promote the use of healthcare information technology and management systems to increase the effectiveness, safety, and quality of patient care.

HIMSS also engages in numerous collaborative activities with other non-profits to achieve its mission.<sup>2/</sup> Of particular relevance to the Commission's pilot program is the Integrating the Healthcare Enterprise ("IHE") collaboration and the Internet2-HIMSS partnership (described below). Sponsored by HIMSS, the Radiological Society of North America and the American College of Cardiology,<sup>3/</sup> IHE is a multi-year initiative that creates technical frameworks freely available in the public domain for passing vital health information seamlessly – from application to application, system to system, and setting to setting – across the entire healthcare enterprise. IHE has already driven the adoption of existing standards to address specific clinical needs in Radiology,<sup>4/</sup> Cardiology,<sup>5/</sup> and Laboratory.<sup>6/</sup> These IHE Integration

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<sup>2/</sup> For more information on HIMSS collaborations, please see [http://www.himss.org/asp/about\\_partnersHome.asp](http://www.himss.org/asp/about_partnersHome.asp).

<sup>3/</sup> For more information on IHE, please see <http://www.ihe.net>.

<sup>4/</sup> Until IHE defined a set of IHE Radiology Integration Profiles, there was no agreed method for the various systems involved (i.e., HIS, RIS, PACS, modalities, printers, workstations, etc.) to work together to manage typical patient care situations. Today there are 16 Radiology Integration Profiles, available at [http://www.ihe.net/Technical\\_Framework/index.cfm](http://www.ihe.net/Technical_Framework/index.cfm).

<sup>5/</sup> The IHE Cardiology Technical Framework contains clinical use cases and technical specifications for the first three IHE Cardiology Integration Profiles: Retrieval of Electrocardiograms for Display, Echocardiography Workflow, and Cardiac Catheterization Workflow. The IHE Cardiology Technical Framework is available at <http://www.acc.org/quality/ihe.htm>.

<sup>6/</sup> In collaboration with three international groups, IHE has developed a Technical Framework in Laboratory. The IHE Laboratory Technical Framework describes an Integration Profile for Scheduled Workflow in Laboratory and is available at [http://www.ihe.net/Technical\\_Framework/index.cfm#laboratory](http://www.ihe.net/Technical_Framework/index.cfm#laboratory).

Profiles specify precisely how standards are to be used to address these needs, eliminating ambiguities, reducing configuration and interfacing costs, and enabling interoperability both within and across multiple enterprises. IHE is also at the forefront of developing technical frameworks using existing standards required to support the continued development and use of electronic health records (“EHRs”).<sup>2/</sup>

Systems using IHE communicate with one another better, are easier to implement, and enable care providers to use information more effectively. As a result, IHE enhances the quality of patient care, resulting in improved safety through the reduction of medical errors, increased savings through lower implementation costs and more efficient workflow, and increased patient and clinician satisfaction through better-informed medical decisions and faster results. Without a reliable, nationwide backbone network dedicated to the healthcare sector, however, the benefits of providing a common, public-domain, standards-based framework for sharing health information among care providers will remain unavailable to the underserved, isolated healthcare providers that stand to benefit the most from broadband healthcare applications.

## **II. Supporting the Commission’s Common Vision of an Integrated National Broadband Network Dedicated to Healthcare.**

HIMSS’s members and the healthcare community at large cannot fully capitalize on numerous healthcare information technology and management systems efforts, including IHE, without a robust, secure, dedicated, ubiquitous, and reliable advanced broadband network. This

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<sup>2/</sup> Because of its proven process of collaboration, demonstration and real world implementation of interoperable solutions, IHE is in a unique position to significantly accelerate the process for defining, testing, and implementing standards-based interoperability among electronic health records systems. See John Hayes and Paula Gould, *IHE Coordinates Pursuit of Electronic Health Record* (2005) at <http://www.diagnosticimaging.com/techfocus/CARSEUROPACS05/03.jhtml>.

is especially true for rural healthcare providers who generally do not have broadband connectivity at this time. HIMSS shares the Commission's desire to improve the quality and availability of healthcare for these isolated and underserved regions, as well as the Commission's goal of enabling nationwide disaster preparedness and response.<sup>8/</sup>

To help make a nationwide healthcare infrastructure a reality, HIMSS chose to partner with Internet2 to explore the development of a secure, reliable, and advanced networking solution for the private and secure transmission of medical information, messages, and images throughout the healthcare industry. Its charitable and educational mission, network capabilities, and experience in the healthcare arena set Internet2 apart from any other backbone network, making it the right choice for facilitating the seamless transmission of health information and applications among healthcare providers. Together, Internet2 and HIMSS have the expertise and resources to explore the creation of a state-of-the-art platform for biomedical research, education, and clinical practice on a national scale.

Internet2 has the proven long-standing track record, reach, capacity, flexibility, and reliability to support a nationwide healthcare network. Using Internet2's secure, advanced backbone network, healthcare providers will have access to telehealth and telemedicine applications that are not feasible over the public Internet. In addition, the Internet2 network's

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<sup>8/</sup> Healthcare delivery is critical to rapid identification and resolution of regional and national level disasters, whether human-made or a natural. Without access to critical information at the opportune moment, the United States cannot adequately respond to medical emergencies in a timely and efficient manner. The HIMSS National Preparedness and Response Task Force is the embodiment of the HIMSS Board of Directors commitment to advancing disaster management issues and solutions to its members and healthcare industry leaders. For more information on the HIMSS NPR Task Force's efforts to enable the nation's health community to respond to crises by harnessing the power of information and information technology, please see [http://www.himss.org/ASP/topics\\_npr.asp](http://www.himss.org/ASP/topics_npr.asp).

reach – both geographic and throughout the healthcare community – means Internet2 can effectively connect isolated rural healthcare providers with the medical expertise and advanced medical technology that resides at large healthcare institutions. Furthermore, Internet2 is testing and developing critical technology to accommodate bandwidth growth in its backbone network, in anticipation of the future demands of its healthcare users as they pursue increasingly bandwidth-intensive applications, like telemedicine.

Internet2's organizational experience in the healthcare arena also sets it apart from other backbone providers, again making it the right choice for HIMSS and the Commission's pilot program. Internet2 has long operated in the healthcare arena, supporting healthcare initiatives such as medical middleware, developing best practices for privacy and security, and advancing the use of advanced network applications in clinical practice. Because of its healthcare experience, Internet2's role in the pilot program will go far beyond providing the "dumb pipes" for transmitting healthcare data. Instead, Internet2 can leverage its healthcare experience and connections with key healthcare institutions to actively foster the development of a robust healthcare network, much like it has done with its K20 initiative, where it has helped connect more than 35 state networks and more than 46,000 U.S. K-12 schools, community colleges, libraries, performing arts centers and museums to the Internet2 network. Moreover, by utilizing Internet2, the Commission's pilot program will benefit from the Internet2-HIMSS partnership, which is already actively working on advanced networking solutions for secure transmission of information and applications over broadband health networks.

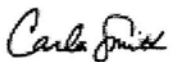
### **III. The Commission Should Maintain the Pilot Program's Use of a Single Backbone Network.**

As discussed above, HIMSS believes Internet2 is the best backbone and organization to support a nationwide broadband health network and the Commission's pilot program. Including other backbone networks at this time would not only be unnecessarily redundant, but also would unnecessarily complicate and weaken the pilot program. The resulting fractured healthcare network would substantially diminish any benefits of broadband connectivity for rural healthcare providers and other pilot program participants. And, the inclusion of multiple unconnected backbones would increase the complexity of the pilot program for the rural healthcare provider participants. Through its years of experience in IHE, HIMSS has learned that unified, multi-stakeholder-developed solutions to interoperability problems are the only option. HIMSS encourages the Commission to maintain its use of a single backbone for its pilot program.

### **CONCLUSION**

Physicians, medical specialists, nurses, administrators, clinicians, and other care providers envision a day when vital healthcare information and applications can be passed securely and seamlessly across a nationwide healthcare network and made appropriately available at the point of care. HIMSS and Internet2 are working together make this vision a reality. The Commission's pilot program could fulfill a crucial role in creating a secure, reliable nationwide broadband health network, and especially in making the network available to rural healthcare providers. For all of the reasons discussed above, the Commission can best effectuate a successful pilot program by affirming its original decision to fund connections only to Internet2's backbone.

Respectfully submitted,



Carla Smith, FHIMSS, CNM



Executive Vice President, HIMSS  
3800 Packard Road Suite 150  
Ann Arbor, MI 48108  
(734) 477-0860

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